STATE OF MISSOURI
Matt Blunt, Governor • Doyle Childers, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

DEC 2 2 2006

CERTIFIED MAIL, 70052570000215846624
RETURN RECEIPT REQUESTED

Mr. Douglas B. Sease, Vice President of Operations
Engineered Coil Co. dba DRS Marlo Coil
PO Box 171
High Ridge, MO 63049

Re: Engineered Coil Co. dba DRS Marlo Coil, 099-0052
Permit Number: **OP2006-093**

Dear Mr. Sease:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important you read and understand the requirements contained in your permit.

If you have any questions or need additional information, please contact the Air Pollution Control Program at (573) 751-4817, or write the Department of Natural Resources' Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS: bgk

Enclosures

c: Ms.Tamara Freeman, US EPA Region VII
Mr. Tom Sims, St. Louis Regional Office
PAMS File: 2002-06-059

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STATE OF MISSOURI
Matt Blunt, Governor • Doyle Childers, Director
DEPARTMENT OF NATURAL RESOURCES
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MEMORANDUM

DATE: December 20, 2006

TO: 2002-06-059 File: Engineered Coil Co. d.b.a. DRS Marlo Coil

FROM: Berhanu A. Getahun, Environmental Engineer BAG for

SUBJECT: Response to Public Comments

The draft Intermediate State Operating Permit for Engineered Coil Co. d.b.a. DRS Marlo Coil was put on public notice as of November 16, 2006 for a 30-day comment period. The public notice was published in Arnold-Imperial Leader in Arnold, Missouri on Thursday, November 16, 2006. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

BAG: kdm

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Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: **OP2006-093**
Expiration Date: DEC 2 1 2011
Installation ID: 099-0052
Project Number: 2002-06-059

Installation Name and Address
Engineered Coil Co. dba DRS Marlo Coil
6060 Highway PP
High Ridge, MO 63049
Jefferson County

Parent Company's Name and Address
Engineered Support Systems, Inc.
201 Evans Lane
St. Louis, MO 63121

Installation Description:
Engineered Coil Co. dba DRS Marlo Coil (Marlo) manufactures cooling coils, steam coils and air handling equipment in High Ridge, Missouri.

DEC 2 2 2006
Effective Date

James L. Kavanaugh
Director or Designee
Department of Natural Resources

Table of Contents

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Marlo manufactures cooling coils, steam coils and air handling equipment in High Ridge, Missouri. The reported actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	0.28	0.00	0.91	9.56	0.02	0.00	0.03
2004	0.14	0.00	0.09	9.61	0.02	0.00	0.00
2003	0.63	0.00	0.09	13.54	0.02	0.00	0.00
2002	0.99	0.01	0.15	18.72	0.08	0.00	0.09
2001	0.97	0.02	0.13	18.52	0.08	0.00	0.04

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0040	EU-004	Three (3) Parts Washers
EU0100	EU-010	Spray Equipment Clean Up (Booths #1, #2 & #3)
EU0130	EU-013	Paint Booth #1
EU0140	EU-014	Paint Booth #2
EU0150	EU-015	Paint Booth #3 with 1.2 MMBtu/hr LPG-fired Drying Oven
EU0310	EU-031	Hand Brush Painting of Product

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

EIQ Reference #	Description of Emission Unit
EU-001	Tube Fabrication, Bending, Forming & Cutting
EU-002	Fin Fabrication, Stamping Plate Type Fins
EU-003	Solvent Cleaning (using Acetone)
EU-005	300 Gallon Gasoline Tank
EU-006	300 Gallon Diesel Fuel Storage Tank
EU-007	1.5 MMBtu/hr Test Lab Boiler (Liqued Propane gas (LPG)-fired)
EU-008	0.125 MMBtu/hr Space Heater (LPG-fired)
EU-009	Applying Glue - Emissions from Application
EU-011	Welding Equipment

EIQ Reference #	Description of Emission Unit
EU-012	Brazing Process
EU-015	1.6 MMBtu/hr Paint Line Boiler (LPG fired)
	0.8 MMBtu/hr Paint Line Boiler (LPG fired)
EU-016	Table Saws
EU-017	Spent Cleaning Solvent Distillation
EU-018	Degreasing Metal (Hand Wipe)
EU-019	150,000 Btu/hr Waste Oil Burner
EU-020	Maintenance Paint Application to Plant Roof
EU-021	Marlo HVAC Leak Testing Equipment
EU-022	Freon Recovery
EU-023	Sand Blasting (Fugitive Dust)
EU-024	Ten (10) Adhesive Cleaning Safety Buckets
EU-025	Maintenance Operations
EU-026	Seven (7) Spotwelders
EU-027	Degreasing & Cleaning of Headers Using Aqueous Cleaners
EU-028	Band Saw Coolant Fugitive Emissions
EU-029	Aerosol Cans (for maintenance cleaning)
EU-030	Maintenance Operation Grinders
EU-032	Sealing/Lagging Operation
EU-033	Abrasive (Hot) Sawing Metal
EU-034	Cold Saws, Metal
EU-035	Caulk Hand Application
EU-036	Anodized Fin Cleaning Using Aqueous Solution
EU-037	Deburring (Cleaning Copper Return Bends with Aqueous Cleaners)
EU-038	Coolants Used in Drills & Saws (Aqueous)
EU-039	Sewer Treatment Plant
EU-040	Squeeze Bottles Hand Application (Fastener Adhesives)
EU-041	Degreasing Sheetmetal & Application of Iron Phosphate Pretreatment
EU-042	Mobile Steam Cleaning Equipment
EU-043	1.25 MMBtu/hr Natural Gas Burners
EU-044	Two (2) Plasma Cutting Torches
EU-046	Hazardous Waste Storage Drums
EU-047	Two (2) Kerosene Space Heater (0.11 & 01.5 MMBtu/hr)
EU-048	Lab R&D Materials

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1) Construction Permit No. 1194-016A

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

Permit Condition PW001

10 CSR 10-6.065

Operating Permits

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

1) The permittee shall emit less than 10 tons of any individual HAP in any consecutive 12-month period; and
2) The permittee shall emit less than 25 tons of any combination of HAPs in any consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of emissions of HAPs emitted into the atmosphere from this installation. Example forms are attached as Attachment A-1 and A-2. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than 10 tons in any consecutive 12-month period of any individual HAP or less than 25 tons in any consecutive 12- month period of any combination of HAPs).

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

Permit Condition PW002

10 CSR 10-6.065

Operating Permits

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The Permittee shall emit into the atmosphere less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of emissions of VOCs emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the VOC emissions from this installation. Example form is attached as Attachment B (Plant-Wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the VOC emission limitation (less than 100 tons in any consecutive 12-month period of VOCs).

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

Permit Condition PW003

10 CSR 10-6.220
Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
2) Exception:
   a) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
   b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2) The following monitoring schedule must be maintained:
   a) Monthly observations shall be conducted for a minimum of eight consecutive months after permit issuance. Should no violation of this regulation be observed during this period then-
   b) Observations must be made once every two months for a period of eight months. If a violation is noted, monitoring reverts to monthly. Should no violation of this regulation be observed during this period then-
   c) Observations must be made semi-annually (i.e., once per reporting period). Observation shall be conducted during the January-June reporting period and during the July-December reporting period. If a violation is noted, monitoring reverts to monthly.
3) If the source reverts to monthly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1) The permittee shall maintain records of all observation results (see Attachments C-1), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
2) The permittee shall maintain records of any equipment malfunctions.
3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C-2)
4) Attachments C-1 and C-2 contain logs including these recordkeeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

Reporting:

1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the and annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0040 – Parts Washers			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0040	Three 20 Gallons (each) Maintenance High Flash Solvent Parts Washers	Model 1594	EU-004

Permit Condition EU0040-001

10 CSR 10-5.300

Control of Emissions From Solvent Metal Cleaning

Emission Limitation:

1) After April 1, 2001, no owner or operator shall operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The director must approve the alternative method.

Operational Limitation/Equipment Specifications:

1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
2) When one or more of the following conditions exist, the design of the cover shall be such that it can be easily operated with one hand such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
   a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F)), such as in mineral spirits;
   b) The solvent is agitated; or
   c) The solvent is heated.
3) Each cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining.
4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
   a) A freeboard ratio of at least 0.75;
   b) Water cover (solvent must be insoluble in and heavier than water); or

c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the director prior to their use.

8) Each cold cleaner shall be operated as follows:
   a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
   b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer.
   c) Whenever a cold cleaner fails to perform within the operating parameters established for it by this regulation, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established operating parameters.
   d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down and leaks secured until the leaks are repaired.
   e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods in accordance with the Missouri Hazardous Waste Management Commission Rules codified as 10 CSR 25, as applicable:
      i) Reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or
      ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the director.
      iii) Waste solvent shall be stored in covered containers only.
9) Operators must be trained as follows:
   a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
   b) The supervisor of any person who operates a solvent metal cleaning process shall receive equivalent or greater operational training than the operators; and
   c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once every 12-month period.

Monitoring/Recordkeeping:

1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment D-3):
   a) Name and address of the solvent supplier.
   b) Date of purchase.
   c) Type of solvent purchased.
   d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
2) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall included all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises (see Attachment D-1). The record also shall include maintenance and repair logs that occurred on the cold cleaner (Attachments D-2).
3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment D-4).
4) All records shall be maintained for five years.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted in the annual compliance certification, as required by Section V of this permit.

EU0100 – Spray Equipment Clean Up			
Emission Unit	Description	Manufacturer/Model #	2005 EIQ Reference #
EU0100	Spray Equipment Clean Up (Boths #1, #2 & #3)	Unknown	EU-010

Permit Condition EU0100-001

10 CSR 10-5.300

Control of Emissions From Solvent Metal Cleaning

Operational Limitation/Equipment Specifications:

Spray gun cleaning. Each owner or operator of a manufacturing and/or rework operation shall clean spray guns used in the application of (and not limited to) primers, paint, specialty coatings, adhesives, sealers, resins and deadeners utilizing one (1) or more of the following techniques:

1) Enclosed system spray gun cleaning shall consist of forcing solvent through the gun. Spray gun cleaning machines used to clean spray guns with the exception of remote open top spray gun cleaning machines shall be exempt from the requirements of parts (3)(B)1.A.(I) and (3)(B)1.B.(I) of this rule. Spray guns and nozzles only may be cleaned in remote closed top spray gun cleaning machines containing solvent-based materials capable of cleaning, provided the removable clean and spent solvent containers (not to exceed thirty (30) gallons in size) are kept tightly closed or covered at all times except when being accessed or maintained. All remote spray gun cleaning machines shall be operated within the manufacturers specifications. All remote closed top spray gun cleaning machines shall not be operated unless the cover is closed and shall be closed or covered when not in use;
2) Nonatomized cleaning shall be exempt from the requirements of parts (3)(B)1.A.(I) and (3)(B)1.B.(I) of this rule. Spray guns shall be cleaned by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. The cleaning solvent from the spray gun shall be directed into (and not limited to) a pail, bucket, drum, or other waste container that is closed when not in use;
3) Disassembled spray gun cleaning shall be exempt from the requirements of parts (3)(B)1.A.(I) and (3)(B)1.B.(I) of this rule. Spray guns shall be cleaned by disassembling and cleaning the components by hand in a cold cleaner, which shall remain closed at all times except when in use. Alternatively, the components shall be soaked in a cold cleaner, which shall remain closed during the soaking period and when not inserting or removing components;
4) Atomizing cleaning shall be exempt from the requirements of parts (3)(B)1.A.(I) and (3)(B)1.B.(I) of this rule. Spray guns shall be cleaned by forcing the cleaning solvent through the gun and directing the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions; and
5) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of part (3)(B)1.D.(X).

EU0130 through EU0150 – Paint Booths EU0310 – Hand Brush Painting of Products			
Emission Unit	Description	Manufacturer/ Model #	2005 EIQ Reference #
EU0130	Paint Booth #1	Not Available	EU-013
EU0140	Paint Booth #2	Not Available	EU-014
EU0150	Paint Booth #3	Not Available	EU-015A, B & C
EU0310	Hand Brush Painting of Products	Not Available	EU-031

Permit Condition EU0130-001 through EU0150-001 and EU0310-001

10 CSR 10-5.330
Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:
The permittee shall not emit or discharge into the atmosphere any VOC from miscellaneous metal parts coating operation (surface coating process) in excess of 3.5 lbs. VOC/gallon of coating (minus water and non-VOC organic compounds) [1]

Monitoring:
The permittee shall use one of the following methods for determining the daily volume-weighted average pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):

1) Application of compliant coatings with records sufficient to demonstrate that the VOC content of each coating applied is less than 3.5 pounds per gallon of coating (minus water and non-VOC organic compounds). Or
2) Calculate the daily volume-weighted average ($DAVG_{VW}$) of all coatings used as delivered to the coating applicator(s) using the following formula found at 10 CSR 10-5.330(5)(B), only if any non-compliant coating(s) is applied:

$$DAVG_{VW} = \frac{\sum_{i=1}^{n} (A_i \times B_i)}{C}$$

Where:
A = daily gallons each coating used (minus water and exempt solvents)
B = lbs. VOC/gal. coating (minus water and exempt solvents)
C = total daily gallon coatings used (minus water and exempt solvents)
n = number of all coatings used

a) The permittee shall determine on a daily basis the volume of coatings consumed, as delivered to the coating applicator(s).
b) The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24. MDNR may require the owner or operator who uses formulation data supplied by the manufacturer of the coating to determine data used in the calculation of the VOC content of coatings by EPA Reference Method 24 or an equivalent or alternative method.

3) If the volume-weighted average mass of VOC per volume of coating (minus water and non-VOC organic compounds), calculated on a daily basis, is less than 3.5 lbs VOC/gallon coating (minus water and non-VOC

[1] *VOC Emission Limitation from 10 CSR 10-5-330(5)(B) Table B – VOC Emission Limit Based on Weight of VOC per Gallon of Coating (minus water and non-VOC organic compounds)*

organic compounds), the source is in compliance. Each daily calculation is a performance test for the purpose of determining compliance with 10 CSR 10-5.330(5)(B).

Recordkeeping:

1) The permittee who uses compliance coatings as required by Monitoring 1 of this permit condition to meet the applicable emission limitations shall maintain a record of the VOC content, in lbs per gallon (Material Safety Data Sheets, etc.), of all coatings used in this surface coating operation.
2) The permittee who uses daily volume-weighted average as required by Monitoring 2 of this permit condition to comply with the applicable emission limitation shall maintain the following records:
   a) The owner or operator of a coating line shall keep records detailing specific VOC sources, as necessary to determine compliance (see Attachment E-1 and E-2). These may include:
      i) The type and the quantity of coatings used daily;
      ii) The coatings manufacturer's formulation data for each coating;
      iii) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
      iv) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
      v) The type and quantity of waste solvents reclaimed or discarded daily;
      vi) The quantity of pieces of materials coated daily; and
      vii) Any additional information pertinent to determine compliance.
   b) Records such as daily production rates may be substituted for actual daily coating use measurement provided the owner submits a demonstration approvable by the director that such records are adequate for the purpose of this rule. This will apply until EPA issues national daily emissions recordkeeping protocols for specific industrial classifications.

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation.

Permit Condition EU0150-002

10 CSR 10-6.060

Construction Permits Required

Construction Permit No. 1194-016A (Amendment to Permit No. 1194-016)

Emission Limitation:

1) Marlo shall emit no more than 40 tons of volatile organic compounds (VOCs) from the paint line #3 in any 12-month period. [Construction Permit 1194-016A: Special Condition Number 1.]
2) The VOC contents of the coatings applied "dry" or "wet on wet" shall meet the requirements established in 10 CSR 10-5.330. [Construction Permit 1194-016A: Special Condition Number 4.]
3) All emission control equipment associated with this plant shall be maintained and operated in serviceable condition as prescribed by the manufacturer during operation of this plant. [Construction Permit 1194-016A: Special Condition Number 5.]

Monitoring/Recordkeeping:

Marlo shall record the monthly and the sum of the most recent 12-months of VOCs emissions (in tons) from this paint line (line #3) using Attachment F or forms of its own, so long as the forms used will accurately demonstrate compliance with the VOC emission limitation (less than 40 tons in any consecutive 12-month period). [Construction Permit 1194-016A: Special Condition Number 2.]

Reporting:

The source shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month, if the 12-month cumulative total (Special Condition Number 2) records show that the source exceeded the limitation of Special Condition Number 1. [Construction Permit 1194-016A: Special Condition Number 3.]

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required
The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits
The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information
1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, or to fires used for recreational purpose, or to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-5.070 Open Burning Restrictions

1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
   a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices,

the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
b) The schedule of burning operations;
c) The exact location where open burning will be used to dispose of the trade wastes;
d) Reasons why no method other than open burning is feasible; and
e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.

4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Engineered Coil Co. d.b.a. DRS Marlo Coil from the provisions of any other law, ordinance or regulation.
5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:
1) Residential, recreational, institutional, retail sales, hotel or educational premises.
2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
3) Premises other than those in 1. and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed. **This requirement is not federally enforceable.**

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:
1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from theses sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
      ii) 10 CSR 10-6.040, "Reference Methods";
      iii) 10 CSR 10-6.070, "New Source Performance Standards";
      iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

1) Recordkeeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
      ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
      iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no

later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1) June 21, 1999;
2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
b) That the installation was being operated properly,
c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Douglas B. Sease, Vice President of Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause
This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis
This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A-1
Highest Individual HAP Emission Tracking Sheet

This form is an example of a form which may be used to record data required by this permit. In order for Marlo to demonstrate compliance with the voluntary individual HAP limit(s), it must demonstrate that the annual emissions of any one individual hazardous air pollutant will not exceed 10 tons in any consecutive 12-month period.

12 Month Rolling Average Recordkeeping Report
Highest Individual HAP Emission by Emission Unit (tons)

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

Attachment A-2
Total HAPS Emission

This form is an example of a form which may be used t record data required by this permit. In order for Marlo to demonstrate compliance with the voluntary aggregate HAP limit(s), it must demonstrate that the emissions of all hazardous air pollutants combined will not exceed 25 tons in any consecutive 12-month period.

12 Month Rolling Average Recordkeeping Report
Total HAPs Emission by Emission Unit (tons)

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

Attachment B
Plant-Wide Emissions Tracking Record

This is an example of a form that may be used to record data required by Permit Conditions PW002. In order to demonstrate compliance with the Permit Condition PW002, Marlo must demonstrate the installation emits less than 100 tons of VOC in any consecutive 12-month period.

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

Attachment C-1
10 CSR 10-6.220 Compliance Demonstration
Opacity Emission Observations

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW003.

Method 22 Opacity Emission Observations			
Date	Method 22 Test Observer	Visible Emissions (yes/no)	If Visible emissions, was a method 9 done? (yes/no)

Attachment C-2

10 CSR 10-6.220 Compliance Demonstration
Method 9 Visual Determination of Opacity

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW003.

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.
Was the emission unit in compliance at the time of evaluation? _____ _____ _____
YES NO Signature of Observer

Attachment D-1

10 CSR 10-5.300 Compliance Demonstration
Solvent Containing Waste Transfer Log

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Attachment D-2

10 CSR 10-5.300 Compliance Demonstration Inspection/Maintenance/Repair/Malfunction Log

Date	Equipment/Emission Unit	Activities Performed

Attachment D-3

10 CSR 10-5.300 Compliance Demonstration
Purchase Records for Cold Cleaning Solvent

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Attachment D-4

10 CSR 10-5.300 Compliance Demonstration
Employee Solvent Metal Cleaning Training Log

Date	Title of Solvent Metal Cleaning Training Course	Instructor

Attachment E-1

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

Compliance Demonstration - Sample Record Form

Daily Record of Substances Used for Coating, Thinning, Purging, and Equipment Cleaning Record

Date	Substance	CAS	Gallons Used Daily	Lbs VOC/gal (less water & non-VOC organic compounds)	Purpose (used for)

Attachment E-2

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*
Compliance Demonstration - Sample Record Form

Daily Calculation of Compliance with Emission Limit

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
Date	Coating Ingredient	Gallons Used Daily	Density (lbs/gal)	VOC Fraction By Weight	Lbs VOC/gal (less water & Non VOC Organic Compounds)	Lbs of VOC per Day (Column C x Column F)	$DAVG_{vw}$ [1]
Example of using the table:							
11/29/05	Ingredient A	25	7.85	0.30	2.35	58.75	-----
11/29/05	Ingredient B	30	8.22	0.25	2.05	61.50	-----
Daily Sum:	-----	55	-----	-----		120.25	**2.19**

Notes:
[1] – $DAVG_{vw}$ = Daily Volume-Weighted Average (lbs/gal)

Instructions:
(a) Column F = [Column D] x [Column E]
Calculate lbs of VOC per gallon of coating ingredient in Column F by multiplying ingredient's density (Column D) by VOC's content in the ingredient (Column E).
(b) Column G = [Column C] x [Column F]
Calculate pounds of VOC per ingredient per day in Column G by multiplying gallons of ingredient used daily (Column C) times lbs of VOC per gallon of ingredient (Column F)
(c) Calculate Daily Volume-Weighted Average - (lbs/gal) in Column H as the daily sum of gallons of VOC (Column G) divided by the daily sum of gallons of all coating ingredients used.
(d) Calculated value of $DAVG_{vw}$ if less than the VOC per gallon of coating limit indicates compliance.

Attachment F

Construction Permit No. 1194-016A – VOC Compliance Worksheet

This form or an equivalent form may be used to record the data required by this permit to demonstrate compliance with Permit Number 1194-016A VOC emissions limitation (Permit Condition EU0150-002).

Column A	Column B	Column C	Column D	Column E	Column F
Process	Material Used (name, type)	Amount of Material Used (include units)	Density (lbs/gal)	VOC Content (weight %)	VOC Emissions (tons)

INSTRUCTIONS: Choose appropriate VOC calculation method for units reported:

(a) 1) If usage is in tons: [Column C] x [Column E] = [Column F]
2) If usage is in pounds: [Column C] x [Column E] x [0.0005] = [Column F]
3) If usage is in gallons: [Column C] x [Column D] x [Column E] x [0.0005] = [Column F

(b) Summation of [Column F] in Tons

(c) A 12-month VOC emissions total of less than 40 tons indicates compliance.

STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Intermediate Operating Permit Application, received June 12, 2002; revised January 20, 2005 and October 31, 2006;
2) 2005 Emissions Inventory Questionnaire, received March 21, 2006; and
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4) Construction Permit No. 0489-001A;
5) Construction Permit No. 1194-016;
6) Applicability Determination (No Permit Required), Project No. 228000052007;
7) Applicability Determination (No Permit Required), Project No. 2003-07-013
8) Applicability Determination (No Permit Required), Project No. 2004-02-088;
9) Applicability Determination (No Permit Required), Project No. 2005-03-032; and.
10) Schreiber, Yonley & Associates October 31, 2006 Letter.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.*

The following indirect heating sources listed in the table below are subject to the requirements of this rule. However, the APCP does not consider these units to be capable of exceeding the particulate matter (PM) emission limitation (0.40 pounds of particulate matter per million BTU's of heat input) of this rule.

Therefore, as shown in the following calculations, these units are always expected to be in compliance with the PM limitation, this rule was not included in the applicable requirements section of this operating permit.

Indirect Heating Source		Heat Input (MMBtu/hr)
EU0150	Paint Booth #3 Drying Oven	1.2
EU-007	Test Lab Boiler	1.5
EU-008	Space Heater	0.125
EU-015A	Two Paint Line Boilers	1.6
		0.8
EU-043	Natural Gas Burner Space Heater	1.25
EU-047	Two Kerosene Space Heaters	0.11
		0.155
	Total Heat Input	6.74

Regulatory PM Limit [10 CSR 10-5.030(3)(B)1.]:= 0.40 lb/MMBtu/hr
Conservatively assuming 1050 Btu per standard cubic foot for natural gas, 94,000 Btu/gal for propane, 135,000 Btu/gal for distillate oil and using the PM emission factor 7.6 lb/MMscf for natural gas combustion, 0.4 lbs/1000 gal for propane combustion and 2.00 lbs/1000 gal for distillate oil (AP-42, Sections 1.3, 1.4 and 1.5, July 1998); the potential emission is 0.0072 lb/MMBtu when using natural gas 0.0032 lb/MMBtu using propane and 0.014lb/MMBtu using kerosene.

Construction Permit Revisions

1) Permit No. 1194-016
This permit was issued on October 31, 1994 to modify the existing paint booth #3 (Permit #0489-001A) to allow use of alternate compliant coatings. This permit superceded the conditions of Permit No. 0489-001A
2) Permit No. 1194-016A
This permit was issued to amend Permit No. 1194-016 to allow use of alternate compliant coating. The special conditions of this permit are incorporated into this operating permit.

New Source Performance Standards (NSPS) Applicability

None Apply.

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of this subpart.

The permittee operates several solvent cleaning stations which use non halogenated solvents as

defined in 40 CFR 63.460, therefore the solvent cleaning stations are not subject to the MACT standards for halogenated solvent cleaning.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

Other Regulatory Determinations
1) 10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*
   - Permit Condition EU0130-001 through EU0150-001 and EU0310-001
     The paint booths are not used for metal coil coating. They are used to coat metal heating and cooling system parts. These coating operations are considered miscellaneous metal parts coating and are subject to the emission limit of 3.5 pounds VOC/gallon of coating of 10 CSR 10-5.330.
   - Applying Glue – Emissions from Application Emissions (EU-009)
     The activity covered by Emission Unit EU-009 is the attachment of insulating material to small portions of large metal parts. A small amount of adhesive is put on the area of the part to be insulated and on the insulating material either using a small brush or aerosol can of adhesive. The spray gun mentioned in the application is no longer used. The insulating material is then attached to the metal parts. This type of process is not a coating process covered by 10 CSR 10-5.330.
2) 10 CSR 10-5 300, *Control of Emissions from Solvent Metal Cleaning*
   - Anodized Fin Cleaning using Aqueous Solution (EU-036), Degreasing Sheetmetal & Application of Iron Phosphate Pretreatment (EU-041), Solvent Cleaning (using Acetone) (EU-003), Degreasing & Cleaning of Headers Using Aqueous Cleaners (EU-027) and Deburring (Cleaning Copper Return Bends with Aqueous Cleaners) (EU-037).
     Since these units use either a non-VOC cleaning solvent or an aqueous solution, they are not subject to 10 CSR 10-5.300.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.
1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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